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February 1, 2022

Hon. Lewis A. Kaplan
United States District Court
500 Pearl Street
New York, NY 10007

Re: United States v. Miguel Thompson
17 Cr. 537 (LAK)

Dear Judge Kaplan:

I am counsel for Miguel Thompson, who hereby moves for early termination of his three-year term of supervised release, which is currently set to expire on April 22, 2023. AUSA Rebecca Mermelstein and United States Probation Officer Noah Joseph Ben-Avrami, who I have informed, have no objection to this application.

*Motion granted.
Supervised release
terminated.*
SO ORDERED
Lewis A. Kaplan
2/1/22

I. Legal Standard:

A court “may modify, reduce, or enlarge the conditions of supervised release, at any time prior to the expiration or termination of the term of supervised release” after considering certain sentencing factors outlined in 18 U.S.C. § 3553(a). 18 U.S.C. § 3583(e)(2).

Where a defendant has served at least one year of his supervised release and his conduct and the interests of justice so require, the court may terminate the remainder of the defendant's supervision, pursuant to 18 U.S.C. § 3583(e)(1). See *United States v. Lussier*, 104 F.3d 32, 36 (2d Cir. 1997).

Given the limited resources of the United States Probation Department, early termination may be warranted in certain circumstances. See *United States v. Trotter*, 321 F. Supp. 3d 337 (E.D.N.Y. 2018) (granting early termination for supervisee in a heroin distribution conspiracy case, where marijuana use was specification in VOSR proceedings). In *Trotter*, the Hon. Jack B. Weinstein praised the United States Probation Department in general:

Our probation officers do a difficult job well; often they have a helpful impact on criminal defendants' lives. Recognizing the